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June 28, 2023

Via ECF

United States District Court
 Southern District of New York
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl Street
 New York, New York 10007

Attn: Hon. Louis L. Stanton

RE: CHRISTOPHER RETZLAFF v. LONG ISLAND RAILROAD COMPANY

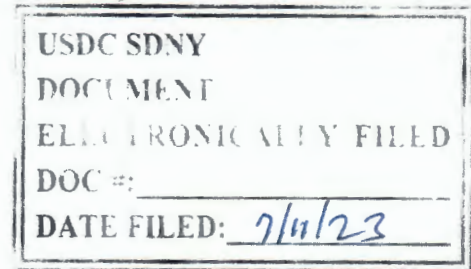
Civil Action No. : 1:22-cv-06641-LLS (JLC)
 Our File No. : LIRR 116

Honorable Sir:

We represent the defendant, Long Island Railroad Company, in the above-referenced matter, and are writing on behalf of the defendant to request a discovery extension as set forth below. There has been one previous request for an extension. Plaintiff's counsel, Sean Constable, Esq., has not consented to this request for the discovery extension.

The current discovery schedule provides as follows:

- Depositions to be completed by June 30, 2023;
- Discovery due by July 7, 2023;
- Expert discovery due by June 30, 2023;
- Fact discovery due by May 19, 2023;
- Pre-Trial Order due by July 28, 2023; and
- Final Pre-Trial Conference set for August 18, 2023 at 2:30 p.m. before Judge Louis



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Stanton.

The parties have been cooperating fully and exchanging discovery without any disputes. The parties have exchanged interrogatory and document responses. The deposition of the plaintiff has been recently completed. The depositions of two representatives of the Long Island Road have also been completed. We are requesting a brief extension as our office is awaiting documents from two of the plaintiff's medical providers pertinent to an expert review/independent medical examination. The defendant respectfully requests the following new deadlines:

- Expert discovery to be completed by August 30, 2023;
- All discovery to be completed by September 7, 2023; and
- Joint Pre-Trial Order and other Trial Submissions to be filed by September 28, 2023.

The defendant also requests that the final Pre-Trial Conference be rescheduled to a date and time convenient with the Court. The defendant thanks the Court for its consideration of this request.

Respectfully submitted,

William J. Crowe

WILLIAM J. CROWE

WJC/kl

cc: Via ECF

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So
Ordered
Louis L.
Stanton
7/11/23